

# **EXHIBIT B**

**MR. CHEN'S CUSTODIAL FILE WOULD NOT BE ADDITIVE**

<b>Category</b>	<b>Total Number of Exhibits</b>	<b>Percentage of Total Exhibits</b>	<b>Percentage of 367,800 Total Documents from 80 ZHP Party Custodians</b>
<b>Deposition Exhibits</b> (13 ZHP Party witnesses, 133 hours of ordered testimony)	386	--	0.105%
<b>Deposition Exhibits Mentioning Mr. Chen</b>	14	3.6%	0.0038%
<b>Email Exhibits Mentioning Mr. Chen</b>	6	1.8%	0.0016%
Email exhibits "from" him	0	0%	0%
Email exhibits "to" him	2	0.6%	0.0005%
Email exhibits that "cc" him	2	0.6%	0.0005%
Email exhibits that "bcc" him	1	0.3%	0.0003%
Email exhibits mentioning Mr. Chen but not sent or received by him	1	0.3%	0.0003%
<b>Exhibits that are not emails that mention Mr. Chen</b>	8	2.1%	0.0022%
Documents he authored	0	0%	0%
Organizational charts	3	0.9%	0.0008%
Powerpoints noting him as founder	1	0.3%	0.0003%
EU/FDA inspection reports noting his role	2	0.6%	0.0005%
Memoranda addressed to him	1	0.3%	0.0003%
Signature on cover letter for DMF submission	1	0.3%	0.0003%